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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE FILED
UNDER SEAL**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am a partner at Kirkland & Ellis LLP, counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I offer this Declaration in
4 the above-captioned matter in support of Uber’s Administrative Motion to Seal Certain Materials Attached
5 to Uber’s Motion to Permit Evidence Under FRE 412.

6 2. Attached as **Exhibit A** is Uber’s Motion to Permit Evidence Under FRE 412 which is
7 sealed in full.

8 3. Attached as **Exhibit B** is Ex. 1 to Uber’s Motion to Permit Evidence Under FRE 412 which
9 is sealed in full.

10 4. Attached as **Exhibit D** is Ex. 2 to Uber’s Motion to Permit Evidence Under FRE 412 which
11 is sealed in full.

12 5. Attached as **Exhibit D** is Ex. 3 to Uber’s Motion to Permit Evidence Under FRE 412 which
13 is sealed in full.

14 6. Attached as **Exhibit E** is Ex. 4 to Uber’s Motion to Permit Evidence Under FRE 412 which
15 is sealed in full.

16 I declare under penalty of perjury under the laws of the United States of America that the foregoing
17 is true and correct.

18 Dated: December 29, 2025

19 /s/ Laura Vartain Horn
20 Laura Vartain Horn
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